



DISTRICT COURT OF MARYLAND FOR

LOCATED AT (COURT ADDRESS)

14735 Main St, Upper Marlboro, MD 20772

CASE NO.

CV

PARTIES

Plaintiff

Pamela Annette Bowman

VS.

Defendant(s):

1. JPMCB

270 Park Ave

New York, NY 10017

Serve by:

- ☒ Certified Mail
☐ Private Process
☐ Constable
☐ Sheriff

2.

Serve by:

- ☐ Certified Mail
☐ Private Process
☐ Constable
☐ Sheriff

3.

Serve by:

- ☐ Certified Mail
☐ Private Process
☐ Constable
☐ Sheriff

4.

Serve by:

- ☐ Certified Mail
☐ Private Process
☐ Constable
☐ Sheriff

ATTORNEYS

For Plaintiff - Name, Address, Telephone Number & Code

No Attorney/Pro se

Pamela Annette Bowman

12310 Kemmerton Lane

Bowie, MD 20715

301-442-0540

COMPLAINT/APPLICATION AND AFFIDAVIT

IN SUPPORT OF JUDGMENT

☐ \$5,000 or under ☐ over \$5,000 ☒ over \$10,000Clerk: Please docket this case in an action of ☐ contract ☒ tort
☐ replevin ☐ detinue ☐ bad faith insurance claim

The particulars of this case are:

I am seeking relief from the three credit bureaus - Equifax, TransUnion and Experian as well as all listed creditors listed as defendants. In this action I am demanding the removal of all fraudulent and erroneous accounts listed on my credit report within 7 days, as well as all addresses that do not match my current mailing address to be removed as well. My life is a direct reflection of my credit score and all defendants have caused great harm and damage to both. As a result, I am also seeking \$29,061.50 in relief and damages. As a result my score should reflect these deletions with an estimated increase of at least 143 points per the credit bureaus online algorithm.

(See Continuation Sheet)

The plaintiff claims \$29,061.50, plus interest of \$ _____, interest at the ☐ legal rate ☐ contractual rate calculated at _____%, from _____ to _____ (1095 days x \$ legal rate per day) and attorney's fees of \$ _____ plus court costs.

- ☐ Return of the property and damages of \$ _____ for its detention in an action of replevin.
☐ Return of the property, or its value, plus damages of \$ _____ for its detention in action of detinue.
☐ Other: Remove derogatories from all 3 credit bureaus within 7 days and demands judgment for relief.

Signature of Plaintiff/Attorney/Attorney Code

CPF ID No.

Printed Name: Pamela Annette Bowman

Address: 12310 Kemmerton Lane Bowie, MD 20715

Telephone Number: 301-442-0540

Fax: _____

E-mail: _____

MILITARY SERVICE AFFIDAVIT

- ☐ Defendant(s) _____ is/are in the military service.
☐ No defendant is in the military service. The facts supporting this statement are: _____

Specific facts must be given for the Court to conclude that each Defendant who is a natural person is not in the military.

- ☐ I am unable to determine whether or not any defendant is in military service.

I hereby declare or affirm under the penalties of perjury that the facts and matters set forth in the foregoing Affidavit are true and correct to the best of my knowledge, information, and belief.

Date

Signature of Affiant

APPLICATION AND AFFIDAVIT IN SUPPORT OF JUDGMENT (See Plaintiff Notice on Back Page)

Attached hereto are the indicated documents which contain sufficient detail as to liability and damage to apprise the defendant clearly of the claim against the defendant, including the amount of any interest claimed.

- ☐ Properly authenticated copy of any note, security agreement upon which claim is based ☐ Itemized statement of account ☐ Interest worksheet
☐ Vouchers ☐ Check ☒ Other written document ☐ Affidavit, Credit Report (Not Attached) ☐ Verified itemized repair bill or estimate

I HEREBY CERTIFY: That I am the ☒ plaintiff ☐ N/A of the plaintiff herein and am competent to testify to the matters stated in this Complaint, which are made on my personal knowledge; that there is justly due and owing by the defendant to the plaintiff the sum set forth in the Complaint.

I solemnly affirm under the penalties of perjury and upon personal knowledge that the contents of the above Complaint are true and I am competent to testify to these matters.

Date

Signature of Affiant

NOTICE TO DEFENDANT

Before Trial

If you agree that you owe the plaintiff the amount claimed, you may contact the plaintiff (or plaintiff's attorney) before the trial date to arrange payment. If you wish to contest the claim, you should notify the clerk's office by filing a Notice of Intent to Defend (located at the bottom of your summons). The case will be set for trial. If you wish to have your witnesses appear at trial, you should contact the clerk's office at least two weeks before the trial date to request subpoenas, and you should bring to court on the trial date any evidence you want the court to consider. If you do nothing, a judgment could be entered against you.

If Judgment is Entered Against You (If You Lose)

IF YOU DISAGREE WITH THE COURT'S RULING, you may:

1. **APPEAL** to the circuit court, by filing a Notice of Appeal in the District Court within **30 days** after the entry of judgment. You will have to pay a filing fee (see Guide to Appeal Fees, DCA-109A), unless the court determines that you are indigent. If the amount of the claim, not counting court costs, interest, and attorney's fees, is:
 - **more than \$5,000**, you will also have to order and pay for a transcript of the District Court trial record, by contacting the District Court clerk's office (see Transcripts & Recordings Brochure, DCA-027BR).
 - **\$5,000 or less**, you will have a new trial in the circuit court.

On your trial date you should bring with you any evidence that you want the court to consider.

2. File a **MOTION FOR A NEW TRIAL** within **10 days** after the entry of judgment, stating your reasons clearly. If the court denies your motion, you may still file an appeal; if the court grants your motion, you must appear in the District Court for a new trial.
3. File a **MOTION TO ALTER OR AMEND THE JUDGMENT** within **10 days** after entry of judgment.
4. File a **MOTION TO REVISE OR VACATE THE JUDGMENT** within **30 days** after entry of judgment.

IF YOU DECIDE NOT TO APPEAL AND NOT TO FILE ONE OF THE ABOVE MOTIONS, you may contact the plaintiff or plaintiff's attorney to arrange to pay the amount owed. If you do not pay the amount owed, the plaintiff or plaintiff's attorney may initiate further proceedings to enforce the judgment, including:

1. **Interrogatories:** You must answer these written questions about your income and assets in writing under penalties of perjury.
2. **Oral Examination:** You must appear in court to testify in response to questions about your assets and income.
3. **Writ of Execution:** The court may issue a writ requiring the sale or seizure of any of your possessions except, with some exceptions, property that is exempt from execution. The exemptions are explained in detail on the reverse side of the Writ of Execution form, DC-CV-040. Further, the court could order you to pay additional expenses such as towing, moving, storage fees, advertising costs, and auctioneer's fees incurred in executing the writ.
4. **Garnishment of Property:** The court may issue a writ ordering a bank or other agent to hold your assets until further court proceedings.
5. **Garnishment of Wages:** The court may issue a writ ordering your employer to withhold a portion of your wages to pay your debt. The law provides certain exemptions from garnishment.

If you have any questions, you should consult an attorney. The clerk of the court is not permitted to give you legal advice. More information can be found in court brochures located in the clerk's office or online at: http://www.mdcourts.gov/district/public_brochures.html.

NOTICE TO PLAINTIFF

REQUESTING A JUDGMENT BY AFFIDAVIT OR DEFAULT:

Federal Law requires the filing of a military service affidavit. Information about the Servicemembers Civil Relief Act and the required affidavit can be found on the court's website at: <http://mdcourts.gov/reference/scra.html>.

AFTER THE COURT ENTERS A JUDGMENT:

1. If the court enters a judgment for a sum certain, you have the right to file for a lien on real property.
2. If you disagree with the outcome of the case, you have the same post-trial rights as the defendant does: you may file an Appeal, a Motion for New Trial, a Motion to Alter or Amend the Judgment or a Motion to Revise or Vacate the Judgment. See above for further information concerning these rights.

(Court Level and Jurisdiction)

Pamela Annette Bowman

(Case ID Number)

Plaintiff

-vs-

JPMCB

Defendants

AFFIDAVIT

I, Pamela Annette Bowman, of Bowie, in Prince George's, Maryland, MAKE OATH AND SAY THAT:

1. It is a fact that I have live at 12310 Kemmerton Lane in Bowie Maryland and am presently living at this address. A copy of my ID was sent to all credit bureaus for correction and verification;
2. It is a fact that I am the Executor, Administrator, etc. for communication against all debt obligations and I am the Chief Executive Officer for PAMELA ANNETTE BOWMAN;
3. It is a fact that I noticed erroneous and inaccurate information on my credit report in December of 2019. There were several fraudulent accounts and multiple inquiries that are not mine;

4. It is a fact that once these errors came to my attention I contacted all three credit bureaus as well as the companies/creditors that were erroneously reported on my credit report;
5. It is a fact that I did not and do not authorize TransUnion, Equifax or Experian or any creditor to misreport any information now or ever;
6. It is a fact that I have sent over 11 letters to each of the three credit bureau as well as to the creditors requesting that the false fraudulent items be removed from my credit report;
7. It is a fact that after not seeing any updates in my report as requested after 10 months of disputing items wrongfully placed on my credit report I sent additional letters via certified mail;
8. It is a fact that certified letters to all three credit bureaus and each of the creditors were mailed beginning May of 2019;
9. It is a fact that I requested all incorrect and erroneous addresses be removed from my credit report in my certified mailings as well as my July 2020 affidavit;
10. It is a fact that I requested that all fraudulent accounts be removed from my credit report as these accounts are not mine;
11. It is a fact that I requested that all inquiries be removed from my credit report as I have not requested or filed for any new credit in the past 3 years;
12. It is a fact the I also requested that all inquiries be removed from my credit report immediately;
13. It is a fact that the credit bureaus and the companies have only sent copies of bills and copies of statements, these are not proof or validation of a debt;
14. It is a fact that a statement does not provide factual evidence that I was the one who opened the account. It is not factual evidence that the account is not fraud;
15. It is a fact that after receiving no relief from any creditors or Equifax, TransUnion and Experian I filed complaints with the Consumer Financial Protection Bureau;
16. It is a Fact that the CFPB sent responses stating that listed creditors and the credit bureaus would conduct yet another investigation which they have already had ample time to do. By this time they had over 14 months to investigate these fraudulent accounts on my report;

17. It is a fact that these items on my report have caused me and my family great stress and mental anguish;
18. It is a fact that having these accounts on my credit report have cost me a considerable amount of money. I have not been able to purchase a home or get a lease due to these accounts;
19. It is a fact that my business has been turned down for funding and I have lost revenue due to these negative accounts on my credit report;
20. It is a fact that I have reached out to a credit restoration company to help restore my credit as all three bureaus and each creditor have not provided relief, nor have they proved that this erroneous debt belongs to me;
21. It is a fact that I am monitoring my credit report which is costing me roughly \$363.00 per year since my discovery of these fraudulent accounts;
22. It is a fact that I have spent \$11,800.00 on credit repair services to get these fraudulent accounts removed from my credit report;
23. It is a fact that I have spent \$1,600.00 on certified mailings and now court filings to get these fraudulent accounts removed from my credit report;
24. I am seeking relief for failure to adhere to the Fair Credit Reporting Act as well as the accuracy of reporting;
25. I demand all addresses be removed from my credit report that are not my current address of **12310 Kemmerton Lane Bowie Maryland 20715.**
26. I demand that all fraudulent and disputed accounts from Portfolio Recovery be removed from my credit report on all three credit bureaus within 7 days of receipt of this notice;
27. I demand that these accounts **not be sold** to any other creditor now or ever and be removed from my credit report immediately;
28. I am seeking relief in the amount of \$29,061.50.00 for violations of all three credit bureaus, lost revenue, cost of credit monitoring services, monies lost for credit repair and costs for all mailing for the past 16 months.

29. It is a fact that I filed a police report regarding these fraudulent accounts found on my credit report; **Exhibit A** (not inclosed)
30. It is a fact that I have notified and demanded no reporting of my credit information by all three bureaus without my written consent;
31. It is a fact that I have notified the credit bureaus that a fee will be assessed of \$1,000.00 per for each unauthorized account remaining on my credit report;
32. I expect that my credit score will be updated within 10 days and there to be an increase in my score as of September 2020 of at minimum 143 points according to the three major bureaus's algorithm. The projected increase per their algorithm states the removal of these fraudulent and derogatory accounts is estimated as such.
33. It is a fact that I requested all disputed fraudulent accounts be removed from my credit report in beginning in May of 2019 from all three credit bureaus and all fraudulent creditors. In addition, several other letters and correspondence was sent to all bureaus as well as creditors. In addition, the credit bureaus as well as the companies were notified of default in July 2020 by certified mail to remove all alleged and fraudulent accounts from my credit report by affidavit;
34. Notice, pursuant to 28 USC 1746(1) and executed "without the United States," I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, to the best of my knowledge. **Further this affidavit Saith Not;**

STATE OF MARYLAND

COUNTY OF PRINCE GEORGE'S

SUBSCRIBED AND SWORN TO BEFORE

ME, on the 16th day of

September, 2020

Signature

Angela Jackson

(Seal)

NOTARY PUBLIC

My Commission expires:

ANGELA MARIE JACKSON
NOTARY PUBLIC STATE OF MARYLAND
My Commission Expires January 28, 2024

(Signature)

Pamela Annette Bowman

Notice, UCC 1-308, UCC 1-204, All Rights
Reserved Without Prejudice